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5 Proposed Special Counsel to the Chapter 11 Trustee,
Richard A. Marshack
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9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

11 In re:

12 THE LITIGATION PRACTICE GROUP P.C.,

13 Debtor.
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Case No. 8:23-bk-10571-SC

Chapter 11

**NOTICE OF FILING APPLICATION
PURSUANT TO 11 U.S.C. SECTION
327(a) AUTHORIZING THE RETENTION
AND EMPLOYMENT OF DINSMORE &
SHOHL LLP AS SPECIAL COUNSEL
FOR CHAPTER 11 TRUSTEE RICHARD
A. MARSHACK AND OPPORTUNITY
TO REQUEST A HEARING**

Date: No Hearing Required

Time:

Ctrm: 5C

411 West Fourth Street, Suite 5130
Santa Ana, California, 92701-4593

Judge: Hon. Scott C. Clarkson

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22 **TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES**
23 **BANKRUPTCY JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE; AND ALL**
24 **OTHER INTERESTED PARTIES:**

25 PLEASE TAKE NOTICE that Richard A. Marshack, court-appointed chapter 11 trustee (the
26 "Trustee" or "Movant") in the chapter 11 case (the "Case") of the above-captioned debtor, The
27 Litigation Practice Group P.C. (the "Debtor"), has filed an Application for authority to retain and
28 employ the law firm of Dinsmore & Shohl LLP ("Dinsmore") as special counsel for the Trustee

pursuant to § 327(a) of Title 11 of the United States Code (the "Bankruptcy Code") and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). Dinsmore will seek compensation from the within bankruptcy estate pursuant to 11 U.S.C. §§ 330 and 331.

The Trustee believes Dinsmore is qualified to represent him and that it is necessary to employ Dinsmore in this Case. Dinsmore has no material conflicts of interest adverse to the bankruptcy estate and Dinsmore is a disinterested person. The Application is made pursuant to 11 U.S.C. § 327. Dinsmore has not received a retainer in connection with its proposed representation of the Trustee. "Connections" as defined in Federal Rules of Bankruptcy Procedure, Rule 2014 to creditors and parties in interest are set forth in the Celentino Declaration (as defined in the Application) filed in connection with the Application.

The rates for this Case for some of the lawyers and paraprofessionals expected to be primarily involved in this Case are as follows:

Name	Title	Published Hourly Rate	Discounted Rate for this Case
Christopher Celentino	Partner	\$831.25	\$825.00
Peter J. Mastan	Partner	\$740.00	\$740.00
Lovee D. Sarenas	Partner	\$660.00	\$660.00
Christopher B. Ghio	Partner	\$625.00	\$595.00
Jeremy B. Freedman	Associate	\$445.00	\$445.00
Jonathan B. Serrano	Associate	\$390.00	\$390.00
Caron Burke	Paraprofessional	\$250.00	\$225.00

The Trustee understands that these billing rates are generally revised on or about January 1 of each year, but that the above rates will remain consistent in this Case through December 31, 2023. For other professionals, the rate will be the published hourly rate generally in effect for the period during which the services are rendered. Because the fees are based on hourly rates and correspond to the experience, expertise and track record of each individual, the Trustee believes the terms and conditions of Dinsmore's employment are reasonable.

1 In addition to the hourly rates set forth above, Dinsmore customarily charges its clients for
2 items of cost and expense incurred in our work on this matter. Items which will be charged
3 separately include copying, messenger services, filing fees, postage and express services, long
4 distance telephone calls, telecopying, IP conversion services, computerized legal research,
5 computer-assisted document preparation, support staff overtime when necessary, and similar items.

6 Dinsmore intends to apply to the Court for allowance of such compensation and
7 reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code,
8 the Bankruptcy Rules, Local Bankruptcy Rules, the standing orders of this Court, and the
9 guidelines, practices and customs of the Office of the U.S. Trustee. Where appropriate, Dinsmore
10 may engage third-party providers to perform specific services. As with Dinsmore's hourly rates,
11 the cost and expense schedule is generally updated on or about January 1 of each year. The current
12 rates for these charges are set forth in Exhibit "A" to the Celentino Declaration.

13 **Deadline for Filing and Serving Opposition Papers and Request for a Hearing:**

14 **PLEASE TAKE FURTHER NOTICE** that any response and request for hearing as to the
15 proposed employment must be in the form as required by Local Bankruptcy Rules 9013-1(f)(1) and
16 (o), and must be filed with the Clerk of the above-entitled Court. The deadline for any response and
17 request for hearing is fourteen (14) days after the date service of this Notice, plus an additional three
18 (3) days if this Notice was served by mail or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F). A copy of
19 any response or request for hearing must be served on the Movant (and proposed special counsel).
20 A copy must also be served on the Office of the United States Trustee, 411 West Fourth Street, Suite
21 7160, Santa Ana, CA 92701. Failure to timely respond may be deemed as acceptance of the
22 proposed relief. See Local Bankruptcy Rule 9013-1(h).

23 Date: June 7, 2023

DINSMORE & SHOHL LLP

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25 By: 

Christopher Celentino

26 Proposed Special Counsel to the Chapter 11
27 Trustee, Richard A. Marshack
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
655 W. Broadway, Suite 800, San Diego, California 92101

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF FILING APPLICATION PURSUANT TO 11 U.S.C. SECTION 327(a) AUTHORIZING THE RETENTION AND EMPLOYMENT OF DINSMORE & SHOHL LLP AS SPECIAL COUNSEL FOR CHAPTER 11 TRUSTEE RICHARD A. MARSHACK AND OPPORTUNITY TO REQUEST A HEARING**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 7, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On June 7, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on June 7, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 7, 2023
Date

Caron Burke
Printed Name


Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Ronald K Brown on behalf of Creditor SDCO Tustin Executive Center, Inc.
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